



Quilter

Quilter Climate
Transition Plan
2026

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Introduction

Quilter plc is a leading provider of financial advice, investments, and wealth management, committed to being the UK's best wealth manager for clients and their advisers.

It has an adviser and customer offering spanning financial advice, investment platforms, multi-asset investment solutions, and discretionary fund management.

The business is comprised of two segments: **Affluent** and **High Net Worth**.



Affluent segment

Quilter Financial Planning

Supports around 1,450 restricted financial planners in the UK. Advisers within our network partner with us to help them run and grow their business. Our national advice business, Quilter Financial Advisers, helps customers across the UK with all their financial planning needs.

Quilter Investors

Our fund management business provides advisers and their customers with multi-asset investment solutions to meet their needs.

Quilter Investment Platform

Enables financial advisers to deliver the very best service to customers and their families, to help them achieve their financial goals. We offer a comprehensive range of products and investments through our award-winning online investment platform.

Quilter Invest

Our digital savings and investment app.

High Net Worth segment

Quilter Cheviot

Our discretionary fund management and financial planning business, which offers bespoke portfolio management services to over 35,000 clients and specialises in helping customers with complex financial needs.

How we approach sustainability

At Quilter, we have divided our approach to sustainability and our impact on climate change into two key pillars that capture our operations and our investment activities.

- ▶ **Corporate sustainability:** Corporate sustainability is managed centrally at the Group level. This reflects the practical reality of how our business operates: our segments share office space, facilities, and resources, making a unified approach to operational sustainability both efficient and effective. Our focus here is on reducing the environmental footprint of our own operations, including our upstream supply chain.
- ▶ **Responsible investment:** Quilter plc has a Group-level objective to be a responsible investor, guided by three thematic priorities: climate change, human rights, and natural capital. These themes shape our engagement activity and inform how we assess sustainability risks and opportunities across our investment offerings. Our two business segments, Affluent and High Net Worth (“HNW”), have distinct investment processes, product offerings, and customer bases. As a result, each segment has developed its own tailored approach to responsible investment and climate change. While both segments incorporate customers’ responsible investment preferences, apply environmental, social and governance (“ESG”) factor integration, and practise active ownership through engagement and voting, they implement these elements in ways that reflect their differing investment processes, operational models, and customer needs.

In 2025, our Affluent and High Net Worth segments published the first iterations of their Climate Action Plans (“CAP”), outlining short-term priorities and key milestones for addressing climate change in relation to the investments they manage on behalf of customers.

Our transition plan

Quilter is committed to playing its part in the global effort to combat climate change. This Climate Transition Plan sets out the steps we will take to transition to a net zero business by 2050, in line with the goals of the Paris Agreement and the UK’s legal commitment to achieving net zero greenhouse gas (“GHG”) emissions.

Where appropriate, we have aligned the structure and content of this plan with the guidance issued by the Transition Plan Taskforce (“TPT”), recognising the importance of consistency and transparency in how organisations approach climate transition planning.

This is the first iteration of our transition plan. It focuses on the actions we will take between now and 2030 to reduce our carbon footprint and lay the foundations for long-term decarbonisation. While we support the principle that companies should have a clear roadmap to net zero by 2050, we acknowledge that a 25-year planning horizon involves a high degree of uncertainty in terms of climate, economic, political, and social factors that may impact our actions. As such, this initial plan prioritises near-term actions that we can implement, monitor, and report against transparently.

To reflect this approach, our plan is structured around two distinct time horizons:

- **Short-term actions, commitments, and targets (2025–2030):** Specific steps we will take to reduce emissions and build resilience; and
- **Longer-term actions (post-2030):** Areas we intend to explore and develop further, without committing to specific timelines at this stage

We will publish an updated transition plan before 2030, which will outline our next phase of actions and provide greater clarity on our longer-term pathway to net zero.



Scope of our Transition Plan

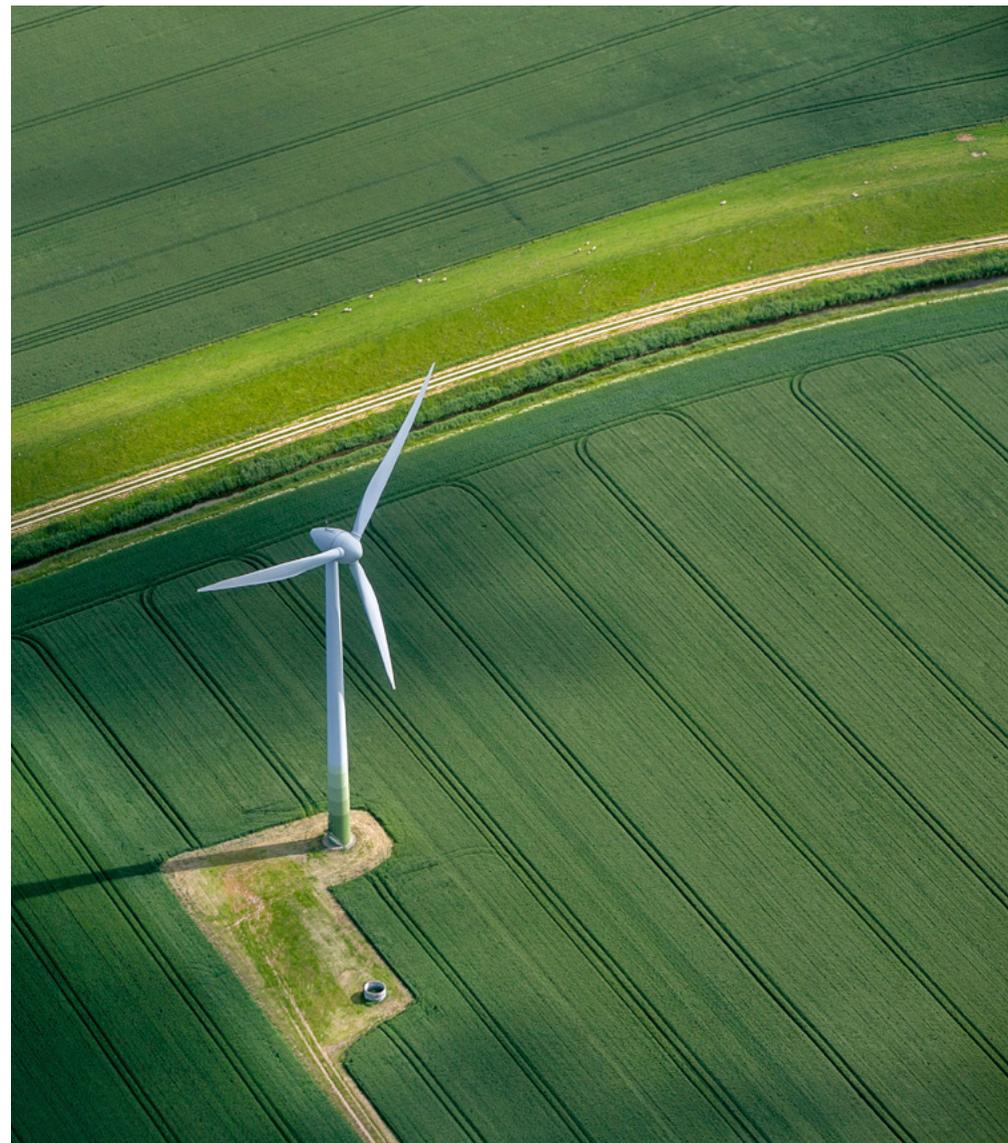
This Climate Transition Plan represents Quilter plc’s overall approach to limiting our impact on climate change. While it includes a high-level summary of how climate is considered within our investment activities, its primary focus is on Quilter’s operational impact and the sustainability performance of our own business activities.

For more information on our investment-related climate activities, please refer to the CAPs:

- [Affluent Climate Action Plan](#)
- [HNW Climate Action Plan](#)

Strategic objectives

Business area	Objectives and levers for action
Operational	Reduce our operational carbon footprint and achieve net zero by 2050 by capitalising on climate-related opportunities across our buildings and operations.
	Reduce the emissions resulting from our upstream supply chain and improve our climate resilience by engaging with our suppliers to encourage the development of climate transition plans, target setting, and disclosure of climate-related risks.
	Actively monitor our exposure to climate-related risks via our Risk Management Framework and controls to ensure, as a business, Quilter remains operationally resilient to the impacts of climate change and transition to a low-carbon economy.
Investments	Facilitate our customers' objectives to contribute to a low-carbon, climate-resilient economy by capturing their preferences and offering sustainability-linked investment strategies that invest in climate solutions and avoid carbon-intensive investments.
	Use our levers as an investor to contribute to the just transition to a low-carbon economy through direct and collaborative engagement and voting activities with companies and fund managers.
	Ensure our investment portfolios are resilient to climate-change risks by integrating environmental considerations primarily through research, due diligence, and information for use in investment processes and stewardship.



Priorities and principles

We acknowledge both the Paris Agreement and the UK's legal requirement to achieve net zero GHG emissions by 2050. In developing our climate strategy, we have prioritised actions and areas of focus based on six interlinked principles that guide how we focus our efforts and allocate resources:

1. Control: We focus first on areas where we have direct control and clear levers for action. This ensures we can deliver meaningful progress quickly and avoid spreading our efforts too thinly.

Our top priority is reducing our direct operational emissions (Scope 1 & 2), where we have the ability to take short-term tangible steps, such as:

- implementing energy efficiency measures;
- replacing gas boilers with HVAC systems; and
- procuring renewable electricity.

2. Influence: Where direct control is limited, we seek to influence others through engagement. This applies to our:

- **Supply chain** – for integrated services, where switching suppliers or selecting based on sustainability credentials is not straightforward or feasible, we engage to encourage more sustainable practices.
- **Investment** – we believe in engagement over divestment, recognising that divestment alone does not drive better outcomes. As active owners, we engage to understand and influence investee companies and third-party managers, using voting as a tool for escalation when available and necessary.

3. Impact: We prioritise actions that offer the greatest potential impact with the lowest cost and resource implications and potential for disruption. For example:

- focusing our office strategy on sites with the highest carbon intensity per square foot or per employee; and
- targeted engagement with high-emitting companies and funds in our investment portfolios and focusing our engagement where we have material holdings.

Impact may be measured in terms of absolute emissions, emissions intensity metrics, materiality, and feasibility.

4. Achievable targets: Any targets that we set must be ambitious but achievable and aligned with our broader business strategy and objectives. Targets will:

- focus on short- and medium-term time horizons, which are more effective than long-term targets that lack a clear, structured implementation plan;
- include clearly defined actions for which management can be held to account;
- be supported by clear, trackable performance metrics with robust underlying data; and
- be reviewed at least annually to ensure they remain appropriate.

We avoid setting targets that place reliance on the actions of third parties, particularly where we lack sufficient data to track progress. For example, we have not set emissions reduction targets for our upstream supply chain, as these would depend on supplier performance. Instead, we have set engagement-based key performance indicators (“KPIs”) that reflect Quilter's own actions and performance.



5. Customer first: As a customer-driven business, our climate strategy must align with our commitment to delivering the best outcomes for our customers. This principle is embedded in our wider business strategy and influences the sustainability actions we can take. For example:

- We select suppliers based on the quality of service they provide, ensuring we can meet our regulatory obligations, maintain operational resilience, and deliver consistently high standards to our customers. While sustainability is a consideration, it cannot override our duty to ensure service continuity and quality
- In-person engagement is a key part of the high-quality service we offer. Meeting with customers and advisers, attending industry events, and holding face-to-face meetings with investee companies and third-party managers are essential to our investment process and relationship management. As a result, our ability to reduce business-travel-related emissions is constrained by the need to maintain service excellence and uphold our responsible investment standards
- For the investments we manage on behalf of our customers, it is essential that our product offering aligns with their risk profiles, financial goals, and specific needs, particularly within our HNW segment, where customers often require bespoke solutions to meet their complex financial needs. As a result, applying blanket investment exclusions or setting company-wide emissions targets across all strategies may not be appropriate. Instead, we incorporate customer preferences into our investment processes and offer responsible investment strategies that reflect their expectations and values.



6. Transparency: We are committed to clear, consistent, and timely reporting on our climate-related actions, progress, and challenges in line with our regulatory obligations. We believe transparency builds trust with stakeholders and supports accountability.

Our plan at a glance

Business area	Emissions Source	Strategic ambitions and priorities	Implementation strategy	Engagement strategy	Metrics, targets, and KPIs
Operations	Emissions generated from our operations across Quilter plc.	Reduce our operational carbon footprint and achieve carbon neutrality in our operations.	<ul style="list-style-type: none"> - Making our offices more energy efficient. - Procuring renewable electricity. - Reducing our reliance on fossil fuels. - Using high quality, high integrity carbon offsets to offset our residual emissions. - Incorporating building standards into our internal policies for office selection and refurbishment. 	<ul style="list-style-type: none"> - Effective internal collaboration with colleagues and stakeholders to drive change. - External direct engagement with property managers and building managers to communicate minimum expectations and encourage change. - Engage with government and regulatory bodies via regulatory consultations. 	<ul style="list-style-type: none"> - Reduce our Scope 1 and market-based Scope 2 emissions by 80% by 2030, from a 2020 baseline. - Where possible, procure 100% of our electricity from renewable sources. - Engage with 100% of our landlords or property managers on sustainability topics annually. - Office sustainability scorecards that incorporate sustainability initiatives, engagement, fuel use, and carbon intensity metrics will be used to monitor effectiveness of our strategy.
	Emissions generated from our upstream supply chain across Quilter plc.	Reduce the emissions from the goods and services we procure and ensure our supply chain is resilient against the impacts of climate change.	<ul style="list-style-type: none"> - Assessing suppliers' climate risks and performance as part of our standard due diligence. - Setting expectations of our suppliers. - Monitoring suppliers' emissions and actions for targeted engagements. - Incorporate sustainability considerations into our procurement policies and standards. 	<ul style="list-style-type: none"> - Targeted engagement directly with our suppliers, prioritising our high emitters to set expectations and drive sustainable action. - Escalate suppliers that fail to engage or meet our sustainability standards with business service owners and procurement teams as key decision makers. 	<p>We have not yet set targets for our supply chain emissions. These will form part of our future strategy. We will focus on the following percentage KPIs to monitor the effectiveness of our actions:</p> <ul style="list-style-type: none"> - suppliers engaged; - suppliers with Science-Based Targets Initiative¹ ("SBTI") or equivalent climate commitments; - suppliers disclosing emissions and climate risks. <p>These will be monitored in terms of 'percentage of key suppliers'² and 'percentage of total spend'.</p>

¹ Ambitious corporate climate action - Science Based Targets Initiative

² For the purposes of our transition plan, we define key suppliers as those that could represent a moderate level of risk to Quilter plc.

Our plan at a glance

Business area	Business Segment	Strategic ambitions and priorities	Implementation strategy	Engagement strategy	Metrics, targets, and KPIs
Investments	Affluent	<p>Facilitate our customers' climate-related investment objectives.</p> <p>Contribute to the climate transition through our stewardship strategy.</p> <p>Ensure our investment portfolios are resilient to the impacts of climate change.</p>	<ul style="list-style-type: none"> Enhance our due diligence, fund assessment, and monitoring processes, to facilitate more robust climate integration and informed stewardship activities. Assess the data availability for our investment universe of additional forward-looking climate-related metrics that can help inform our potential net zero strategy and quantify the extent of integration of climate risk undertaken by our managers on our investments. Provide additional training for advisers to help customers understand how climate change preferences relate to the climate resilience of portfolios and the contribution to the transition. 	<ul style="list-style-type: none"> Direct engagement with our third-party managers on their approach to climate and transition plans. Engagement with our customers to understand net zero preferences. Engagement with data providers on oversight, data quality, and improved modelling. Collaborative engagements with other investors with shared climate-related objectives. Engage with government, regulators and bodies on regulatory consultations and developments. 	<ul style="list-style-type: none"> Climate metrics as set out in our TCFD reporting. Ongoing tracking of the breadth and depth of engagements through alignment to themes, asset classes, and outcomes.
	High Net Worth		<ul style="list-style-type: none"> Set sector-specific climate expectations for our equity holdings and a similar set of expectations for third-party funds. Evaluate the alignment and performance of our assets using quantitative and qualitative climate metrics against our baseline to inform our engagement and voting activities. Utilise our voting rights (where we control them and they are available) as an escalation measure to hold holdings to account. 	<ul style="list-style-type: none"> Direct engagement with our equity holdings and third-party managers on climate disclosures, targets, and transition plans. Understanding and delivering clients' climate-related investment preferences. Collaborative engagements with other investors with shared climate-related objectives. Engage with government, regulators and bodies on regulatory consultations and developments. 	<ul style="list-style-type: none"> Climate metrics for our centrally monitored holdings as set out in our CAP and TCFD reporting. SBTi alignment of our centrally monitored corporate bond and equity holdings held directly and through third-party managers. Ongoing tracking of the breadth and depth of engagements through alignment to themes, asset classes, and outcomes.

Implementation strategy

The near-term actions we will take to decarbonise Quilter plc, longer term measures under consideration to progress toward net zero 2050, and the associated financial implications and policy changes needed to embed sustainability across our operations.

Implementation strategy

In this section, we outline the actions Quilter is taking across our business operations, products, and services, and internal policies to support our strategic climate ambitions. As noted in the introduction, this plan provides an overview of Quilter plc's climate-related activities, with a particular focus on our operational impact and Group-level strategy. Detailed implementation strategies for our Affluent and HNW segments are set out in their respective CAPs.

Operational emissions

The table below outlines the emissions categories relevant to Quilter, along with the strategies we are implementing to reduce our operational emissions through targeted action and engagement. It also highlights the key limitations and challenges we face in delivering these reductions.

Emissions category	Scope, levers, dependencies, and limitations	Short-term priorities Actions we are planning to take between now and 2030	Journey to net zero Actions we are considering post 2030 to achieve net zero by 2050
Scope 1			
Stationary combustion	This category includes direct emissions from the combustion of fuels (e.g. natural gas and diesel) at Quilter-operated office sites. Where Quilter has operational control, we are able to directly influence decarbonisation by replacing fossil fuel systems with low-emission alternatives. However, in leased premises where heating systems are landlord-controlled, our influence is limited to engagement and advocacy, which may not always result in the removal of fossil fuel use.	<ul style="list-style-type: none"> - Where Quilter has operational control, improve the efficiency of gas boilers or transition to energy-efficient HVAC systems and replace diesel backup generators with low-emission alternatives. - Where heating systems are landlord-controlled, engage constructively to advocate for the replacement of gas heating with HVAC technologies. 	<ul style="list-style-type: none"> - Eliminate any remaining fossil-fuel-based heating systems. - Where full elimination is not feasible, utilise high-integrity carbon credits to offset residual emissions and support the achievement of net-zero targets.
Refrigerants	Emissions arise from leaks in air conditioning systems maintained by Quilter. These leaks, though incidental, have a disproportionately high global warming potential. Our primary levers include monitoring for frequent leaks and phasing out systems using high global warming potential ("GWP") refrigerants. However, system replacement can be capital-intensive and must be weighed against the potential emissions savings.	<ul style="list-style-type: none"> - Continue systematic monitoring and documentation of refrigerant leaks via maintenance records. - Investigate systems with recurring leaks in collaboration with facilities management to identify root causes and implement preventative measures. 	<ul style="list-style-type: none"> - Replace systems with high leakage rates and phase out those using refrigerants with high GWPs. - Offset any remaining refrigerant-related emissions using high-integrity carbon credits aligned with recognised decarbonisation standards.
Scope 2			
Purchased electricity	Where Quilter controls electricity procurement, we are able to reduce emissions by switching to renewable tariffs and improving energy efficiency. In other multi-tenant buildings, we rely on our engagement with landlords to encourage them to adopt similar measures. On-site renewable generation to reduce our consumption of purchased electricity is constrained by lease terms, space limitations, and high capital costs.	<ul style="list-style-type: none"> - Where Quilter manages procurement, transition to renewable electricity tariffs by 2027 and implement energy efficiency measures across offices. - Where landlords are responsible for energy procurement, engage to communicate expectations regarding renewable energy sourcing and building performance standards. 	<ul style="list-style-type: none"> - Achieve zero market-based emissions from electricity consumption through exclusive use of renewable electricity. If this is not possible in certain regions, use region appropriate Energy Attribution Certificates ("EACs") to offset residual emissions.

Emissions category	Scope, levers, dependencies, and limitations	Short-term priorities Actions we are planning to take between now and 2030	Journey to net zero Actions we are considering post 2030 to achieve net zero by 2050
Purchased heat and steam	This applies specifically to our Southampton office, which uses a geothermal heat source. Due to contractual constraints, we are unable to replace this system until 2031. Our ability to decarbonise is therefore deferred, although we can plan for a transition to a more efficient, renewable-powered HVAC system post 2030.	<ul style="list-style-type: none"> – Preparatory work will focus on ensuring efficient heating infrastructure is in place post 2030. 	<ul style="list-style-type: none"> – Replace the geothermal system with a more efficient HVAC system powered by renewable energy, contributing to long-term decarbonisation.
Scope 3			
Purchased goods and services	Emissions in this category arise from the goods and services procured across Quilter's operations. While we can influence procurement decisions and engage with key suppliers, replacing embedded suppliers may compromise service continuity or customer outcomes. Many of our critical suppliers are selected based on a range of factors that support operational resilience and the delivery of high-quality service, meaning sustainability performance alone cannot dictate supplier selection. Furthermore, a significant proportion of suppliers do not currently disclose emissions data, limiting our ability to assess supply chain performance. Encouraging improved emissions disclosure will therefore be a central component of our supplier engagement strategy, enabling more informed decision making and a clearer understanding of our supply chain emissions profile.	<ul style="list-style-type: none"> – Identify opportunities to replace less embedded/ integrated suppliers with more sustainable alternatives. – Engage with our colleagues to educate and encourage more sustainable procurement decisions and incorporate sustainability factors into our procurement policies. – Engage with our embedded suppliers to: <ul style="list-style-type: none"> • set climate-related expectations with regards to decarbonisation targets and plans; and • gather information to inform our supplier decarbonisation strategy and targets for our supply chain. 	<ul style="list-style-type: none"> – Maintain active engagement with suppliers to drive emissions reductions and seek opportunities to engage suppliers on a collaborative basis with our peers. – Develop a comprehensive supply chain decarbonisation strategy with defined targets and KPIs. – Consider longer-term options for phasing out suppliers not aligned with net zero 2050.
Fuel and energy-related activities	The upstream emissions from the fuel and energy we procure that is not tracked under Scope 1 or 2. As these are calculated using national grid emissions factors, our direct influence is limited. Our primary lever is to support grid decarbonisation through the procurement and adoption of renewable energy while supporting the transition through our responsible investment engagements.	<ul style="list-style-type: none"> – Implement identified energy efficiency improvements across offices. – Support UK grid decarbonisation through renewable energy procurement. 	Offset our residual upstream energy-related emissions through the purchase and retirement of high-integrity carbon offsets to achieve carbon neutrality in Scope 3 emissions.
Waste	As a service-based business, Quilter generates relatively low volumes of physical waste. While we are committed to exploring waste reduction initiatives (such as promoting the use of reusable utensils and discouraging unnecessary printing), the overall impact on our emissions profile is expected to be modest. Our primary levers lie in ensuring that waste is accurately tracked, properly segregated to maximise recycling, and diverted from landfill wherever possible. However, in some leased offices, waste management practices are controlled by landlords, which limits our ability to implement consistent and comprehensive waste reduction strategies across all sites.	<ul style="list-style-type: none"> – Enhance waste tracking and reporting across our offices to improve visibility and inform future waste reduction targets. – Engage with our colleagues to improve awareness and encourage more sustainable behaviours with regards to waste. – Work closely with our facilities management provider to ensure waste is properly segregated and colleagues are provided with reusable amenities. 	Offset our residual waste-related emissions through the purchase and retirement of high-integrity carbon offsets to achieve carbon neutrality in Scope 3 emissions.

Emissions category	Scope, levers, dependencies, and limitations	Short-term priorities Actions we are planning to take between now and 2030	Journey to net zero Actions we are considering post 2030 to achieve net zero by 2050
Business travel	Meeting our advisers and customers is an integral part of our business, we therefore cannot completely eliminate our business travel emissions. However, we can seek to reduce them through policy changes and more sustainable travel choices.	<ul style="list-style-type: none"> - Review the Quilter Business Travel Policy to explore ways in which we can reduce our emissions through policy change. - Engage with our colleagues to educate and encourage more sustainable travel choices. - Explore how we can utilise internal carbon pricing to change travel behaviours and fund the future offsetting of travel-related emissions. 	<ul style="list-style-type: none"> - Offset our unavoidable air travel emissions through the use of sustainable aviation fuel certificates, either via direct use, or via the 'book and claim' model. - Offset other unavoidable travel emissions (e.g. car, rail, hotels) using high-integrity carbon offsets.
Employee commuting (including WFH)	This category includes emissions from colleagues commuting to the office, as well as those generated while working from home ("WFH"). Our influence is limited to encouraging and enabling more sustainable commuting behaviours through awareness campaigns and supportive infrastructure. Where feasible, we provide facilities such as bike storage and electric vehicle ("EV") charging points at key office locations. However, these are only available at certain sites due to space, lease, or technical constraints.	<ul style="list-style-type: none"> - Engage with our colleagues to enhance awareness around sustainability and encourage more sustainable commuting choices. - Continue to provide colleagues with the facilities to commute sustainably, including bike storage and EV charging points (where possible) in our key offices. 	

Approach to responsible investment

Quilter's responsible investment strategy is guided by three thematic priorities: **climate change**, **human rights**, and **natural capital**. These themes shape our ESG integration, stewardship activities, and how we incorporate customer preferences across our two investment segments.

- **Affluent** – All funds within the Affluent investment universe are assessed using our RI Tiering Framework, which integrates ESG factors into the investment process. This framework also guides our monitoring and stewardship activities, ensuring that ESG considerations are embedded in investment decisions, and that engagement and voting are conducted based on materiality and relevance.
- **HNW** – Quilter Cheviot applies its responsible investment approach to all centrally monitored holdings, which represents the majority of its assets under management ("AuM"). These are the focus of ESG integration, engagement, and voting activities. Other holdings, such as investment manager-led ideas and cherished holdings, are subject to stewardship activities where certain materiality thresholds are met.

For further detail on how our business model is adapting in terms of ESG integration, stewardship, customer preferences, product strategy, and the latest AuM figures, please refer to the Quilter plc TCFD Report and the Affluent and HNW CAPs.

Financial implications of our strategy

Developing and implementing a robust sustainability strategy and climate transition plan requires targeted investment across our operations, people, data, and systems. While these investments may lead to increased short-term costs, they are expected to deliver long-term value through cost efficiencies, enhanced resilience, alignment with stakeholder expectations, and regulatory compliance.

We outline the climate-related risks, opportunities, and associated financial impacts in our latest TCFD Report. Our strategy is designed to mitigate financial risks, such as potential reductions in AuM and revenue due to reputational damage or a failure to meet customer expectations on climate action, while also enabling us to capitalise on opportunities for value creation through responsible investment.

Corporate sustainability

The actions outlined in this plan to achieve net zero by 2050 will result in increased operational costs for Quilter. However, acting responsibly and minimising our environmental impact is fundamental to our purpose and values. We believe this commitment is important to our stakeholders and essential to maintaining our long-term competitiveness.

As part of the Group's Business Planning process, the Group considers how climate-related risks and opportunities impact the three-year Business Plan. This includes consideration of property and related costs and the impacts of responsible investment and corporate sustainability on the Group's revenue and expenses.

Key financial implications and assumptions include:

- **Office energy efficiency:** As we lease, rather than own, our office spaces, investments in energy-efficiency improvements do not directly enhance our balance sheet. However, we anticipate long-term reductions in electricity consumption and associated costs. Our 2024 Energy Savings Opportunity Scheme ("ESOS") audit, summarised in our TCFD Report, outlines potential energy cost savings. As many of these projects are still in the assessment phase, we are not yet in a position to disclose precise upfront investment figures;
- **Renewable energy tariffs:** Transitioning to renewable energy tariffs may lead to modest increases in energy costs. However, we do not expect these to be material in the context of our overall energy expenditure;
- **Carbon offsets:** As part of our future strategy, we are exploring the use of carbon offsets to address residual emissions. The purchase of offsets will represent an additional cost to Quilter. In line with UK Government guidance, we are prioritising direct emissions reductions before relying on offsets. Current prices for voluntary carbon offsets vary significantly, from approximately £2 per tonne to over £1,000 per tonne, depending on the type of project, level of verification, and provider. While we can estimate our targeted market-based residual emissions for 2030, we are not yet able to disclose expected costs until our offsetting strategy is finalised. We anticipate that demand for high-quality, high-integrity offsets will increase, potentially driving prices up in the short term. However, as the availability of scalable, technology-based carbon removal solutions grows, we expect prices to stabilise or decline over the longer term. Our longer-term strategy will include ongoing efforts to reduce residual emissions and to develop a purchasing approach that mitigates exposure to carbon price volatility; and
- **Supplier and procurement strategy:** As part of our longer-term actions, we plan to engage with our suppliers and explore how sustainability factors can be integrated into our procurement policies and decision-making processes. This will enable us to prioritise suppliers with stronger environmental credentials. While choosing more sustainable suppliers may lead to short-term changes in our cost base, we do not expect these to be significant as our initial focus will be on the procurement of physical goods rather than embedded services.

These investments are expected to reduce long-term financial risks, including potential regulatory non-compliance costs and reputational damage. They also enhance our attractiveness as a business partner and employer by demonstrating our commitment to sustainability, which is increasingly valued by customers, investors, and other stakeholders.



Responsible investment

- **Value creation and revenue growth:** We anticipate that our approach to responsible investment, which includes offering customers the ability to invest in line with their responsible and sustainable values, and integrating these preferences into our suitability and advice processes, will support customer retention and attract new business from a broader range of customers. As a signatory to the UK Stewardship Code, we are committed to the responsible allocation, management, and oversight of capital to create long-term sustainable value for customers and beneficiaries. Our active ownership approach, including climate-related engagements, is designed to deliver long-term value creation, enhance our proposition, and, if delivered successfully, contribute to growth in AuM. However, the revenue growth from capitalising on this opportunity is not separately identifiable, as we cannot isolate the impact of our responsible investment strategy from other growth initiatives, product development efforts, or broader market dynamics.
- **Portfolio risk management:** As part of our approach to responsible investment, we assess and monitor climate-related risks within our investment portfolios that have the potential to negatively impact asset valuations and reduce long-term returns for customers. Our approach to ESG integration and active ownership supports the proactive identification and management of risks, ultimately protecting portfolio values. This reduces the risk of poor customer outcomes and reputational damage. As this approach is integrated into our broader investment processes, isolating and quantifying the avoided financial impacts of this strategy and the avoided reputational damage involves significant uncertainty and would not provide decision useful information.
- **Investment in capabilities:** Delivering on our responsible investment strategy requires ongoing investment in people, data, systems, and governance. While costs are identifiable, isolating the costs of the climate element of our responsible investment strategy is more challenging and the long-term financial benefits are subject to high measurement uncertainty and depend on evolving market and regulatory dynamics.



Policies and conditions

A key element in delivering our climate strategy and embedding lasting change is the integration of climate and sustainability requirements into Quilter’s internal policies and governance frameworks. Between now and 2030 we will be undertaking systematic reviews of existing policies to ensure they reflect our climate-related commitments and support the implementation of our transition plan. This process will help align operational practices with our strategic ambitions, drive consistent decision making across the business, and enable measurable progress towards our net zero goals.

Policies	Coverage and purpose	Requirements	Contributions to strategic objectives
Responsible Business Policy	Sets out requirements to be applied across the Group to ensure that Quilter operates sustainably and invests responsibly while complying with the related regulatory obligations and voluntary standards.	<p>The policy was reviewed and updated in 2025 to incorporate the following foundational requirements:</p> <ul style="list-style-type: none"> – transparently disclose in line with TCFD and other regulatory frameworks, including emissions disclosure on annual basis; – maintain corporate sustainability and responsible investment strategies aligned to the relevant external frameworks and principles. These strategies must be subject to appropriate governance; and – identify climate-related risks and opportunities through top-down and bottom-up risk management processes and consider those risks when setting business strategy and financial planning. 	Embeds climate-related governance and disclosure practices that support operational resilience and responsible investment, aligning with our strategic objective to monitor and manage climate-related risks across the business.
Procurement policies	A range of policies owned by the internal procurement team that set minimum standards when selecting suppliers.	<p>In 2025, we integrated sustainability considerations into the standard supplier due diligence and onboarding. We will explore the possibility of including sustainability requirements applicable to the purchase of certain goods or services. These may include selecting suppliers that are:</p> <ul style="list-style-type: none"> – currently carbon neutral or have targets and plans to be within a specified timeframe; – compliant with recognised sustainability frameworks or certifications, such as ISO14001³, EcoVadis⁴, or SBTi; and – minimising environmental impact through sustainable materials, waste reduction, or circular economy practices. 	While these requirements will apply to a limited number of suppliers, ensuring we only procure goods from suppliers that meet these standards will have a positive impact on our upstream supply chain emissions.

³ ISO 14001:2015 – ISO 14001 – Environmental management systems

⁴ Enterprise Solutions for Sustainable Supply Chains | EcoVadis

Policies	Coverage and purpose	Requirements	Contributions to strategic objectives
Supplier Code of Conduct⁵	This is a publicly available policy that applies to all suppliers and their sub-contractors that provide goods and services to Quilter. It sets out the minimum standards we expect our suppliers to adhere to and promote adherence to throughout their own supply chain, where practical.	The existing policy was updated in 2025 to include requirements for suppliers to identify and manage their environmental risks (including climate risks) and provide Quilter with environmental information on request. We intend to review this policy with the view of including requirements covering: <ul style="list-style-type: none"> – calculation and disclosure of operational emissions; and – emissions reduction targets and disclosure of climate transition plans. 	Short term, setting more explicit expectations of suppliers with regards to disclosure will allow us to calculate more supplier-specific emissions and enable targeted engagements or potential replacement. Supplier emissions reductions will reduce our Scope 3 emissions in the long term.
Business Travel Policy	This applies across Quilter, to all colleagues, and outlines limitations, restrictions, and general guidance on business travel.	We plan to review this policy with the view to implementing new guidance or requirements aimed at: <ul style="list-style-type: none"> – reducing the volume and frequency of business travel; and – encouraging more sustainable travel choices. 	While not an immediate strategic ambition, the policy requirements would reduce our Scope 3 emissions supporting our long-term ambition to achieve net zero by 2050 across all scopes.
Property-related policies	These policies set out the minimum standards for our offices, including office selection and refurbishment. These policies also govern other areas including energy procurement and waste management.	The Corporate Sustainability team is collaborating with the Security and Property function to incorporate sustainability standards into these policies. The standards being explored include: <ul style="list-style-type: none"> – office refurbishments must be completed in line with SKA Gold standards; – offices must meet recognised sustainability building standards such as BREEAM, SKA, or LEED and have a minimum EPC rating; – offices must be fossil fuel free or have a plan to phase out these energy sources; – buildings must proper waste management and tracking facilities; and – all energy contracts entered into by Quilter must be 100% renewable 	Building and refurbishment standards will directly contribute to energy efficiencies and emissions reductions. Fossil fuel phase-out across our offices will reduce our Scope 1 emissions and allow us to heat our buildings with renewable energy, directly supporting our operational emissions reduction targets.
Responsible investment (“RI”) policies and Climate Action Plans	Affluent and HNW maintain their own set of RI policies and CAPs. These include an overall RI Policy, Voting Policy, and Engagement Policy. <ul style="list-style-type: none"> – <i>Affluent Responsible Investment Policy</i> – <i>Affluent Voting Policy</i> – <i>Quilter Cheviot Responsible Investment Policy</i> – <i>Quilter Cheviot Voting Policy</i> – <i>Quilter Cheviot Engagement Policy</i> 	<ul style="list-style-type: none"> – RI policies set out the overall approach to climate matters. The Affluent and HNW policies are reviewed and updated annually. – Voting policies provide clear guidelines on how each segment approach voting on climate-related matters and use voting as an escalation for their engagement strategy. – CAPs set out the overall approach to climate and hold each segment to account as they are publicly available and will be reported against on an annual basis via TCFD reporting. 	The policies govern the responsible investment strategy and related activities and are informed by our strategic objectives. The CAPs set out the levers we have as investors and how we intend to use them to contribute to the climate transition.

In addition to the above, we plan to introduce a cross-cutting Sustainability Policy that sets out minimum climate-related standards applicable across all segments of Quilter plc. The policy will include our climate-related commitments and requirements around the purchase of carbon offsets.

⁵ 218-1344-quilter-supplier-code-of-conduct.pdf

Engagement strategy

How we intend to collaborate with colleagues, suppliers, investment holdings, and other stakeholders to support the delivery of our transition plan.

Engagement strategies

Our stakeholders

The proportion of our emissions that are under our direct control is relatively limited, and decarbonisation of our operations, supply chain, and investment portfolios is dependent on the actions of others. Our decarbonisation relies on the following stakeholder dependencies:

Landlords and property managers

Our ability to implement sustainability and energy efficiency measures across our offices is largely dependent on lease arrangements and the level of control we have over building operations. In many cases, key aspects, such as fossil fuel use, energy contracts, and waste management, are managed by landlords or property managers, limiting our ability to adopt renewable energy tariffs or implement energy efficiencies in line with our strategic objective.

To address this in 2025, we developed our property engagement strategy and launched phase one of the programme. This initial phase focused on gathering information about the sustainability measures currently in place at each office, and improving the quality and frequency of the data we receive for our emissions calculations. The insights collected enabled us to create a sustainability scorecard for each location, assessing performance across a range of criteria, including emissions intensity metrics.

The scorecards allow us to monitor our progress and will guide our prioritisation for future engagement, with a particular focus on targeting the worst-performing offices for improvement. As part of our ongoing strategy, we aim to engage directly with each office at least annually, ensuring regular dialogue and progress tracking.

The next phases of our engagement will build on this foundation by communicating our minimum sustainability expectations for each office and encouraging landlords to implement targeted initiatives, such as HVAC system upgrades, building management system (“BMS”) improvements, and the installation of LED lighting. Through ongoing engagement, we aim to influence decision making and drive meaningful decarbonisation across our property footprint.

To support this, we are establishing an internal escalation process through our governance channels. This will enable us to escalate concerns where offices fail to engage, demonstrate progress, meet our minimum standards, or provide necessary data.

Suppliers

As outlined in our implementation strategy, the majority of our supply chain expenditure is directed towards service providers such as technology, data, and custody services. These suppliers are selected based on their ability to support Quilter in delivering the best outcomes for customers and maintaining operational resilience. Given their deep integration into our systems and processes, replacing them with more sustainable alternatives in the short term would risk significant disruption to our services. Engagement is therefore our most effective tool for encouraging sustainable practices and reducing upstream emissions.

To support this, we developed our supplier engagement strategy in 2025, laying the foundations for a structured and long-term approach to decarbonising our supply chain and improving resilience to climate-related risks.

To aid the delivery of our strategy, we implemented a new system to source more supplier-specific emissions data and track engagement progress; integrated climate-related sustainability questions into our standard supplier due diligence process and established a set of minimum sustainability expectations for suppliers.

Building on this foundation, we will begin phase one of our engagement programme in 2026. This phase will involve reaching out to all suppliers to build a clearer picture of our supply chain and identify climate-related risks. Our primary objective is to improve data coverage across our supplier base, which will enable more targeted future engagement. The insights gathered will allow us to segment suppliers into cohorts based on their sustainability performance, risk level, and materiality.

Phase two will focus on direct engagement with material suppliers (those above a defined spend threshold and providing recurring services) who do not currently meet our minimum standards. One-off transactional suppliers are not included in our engagement plan. Targeted suppliers will be asked to complete an enhanced sustainability questionnaire, which will allow us to develop a sustainability score for each supplier. These scores will be used to prioritise future engagement and track improvements over time.

This will be an ongoing initiative, with future phases targeting suppliers with the lowest sustainability scores. We will monitor progress using KPIs, including changes in supplier scores and the percentage of supply chain spend covered by active engagement.

Suppliers that fail to meet our minimum standards or do not meaningfully engage will be escalated to our procurement team and the relevant service owners. This escalation process ensures that sustainability performance is considered in future sourcing and renewal decisions.

Our long-term goal is to decarbonise our supply chain and ensure Quilter remains resilient to climate-related supply chain risks.

Companies and funds in our investment portfolios

For most of our investment strategies, we believe stewardship and engagement are more effective decarbonisation tools than exclusion or divestment. While we offer products that align with customers' responsible and sustainable investment preferences, company-wide exclusions, such as divesting from high emitters, would not be appropriate for our broader product offering and customer base:

- **Affluent customers:** Our products and strategies are primarily designed for the broader retail market for investors seeking long-term capital growth. For clients who want more targeted responsible investment options, we offer products with specific carbon constraints;
- **HNW customers:** These customers often have bespoke financial needs and specific investment preferences, making blanket exclusions or divestment from certain assets based on their sustainability credentials impractical.

Additionally, simply divesting from holdings with a higher carbon intensity may result in these assets being acquired by investors who place little or no emphasis on supporting the transition to a low carbon economy. In such cases, without positive shareholder influence and active voting on climate matters, the incentive for those companies to adapt and reduce the emissions diminishes, hindering the progress towards a low carbon future.

Conversely, there are companies with a higher carbon intensity that are focused on developing solutions for a lower carbon world. We believe that engaging with these companies to support positive behaviours and better understand their transition plans is more effective than divesting or excluding them from our portfolio due to their carbon intensity.

We engage on a direct basis with the companies and funds in our portfolio, but we are also members of a number of collaborative engagements with our industry peers – more information on our collaborative engagements is available in our regular Stewardship Code reporting. Where appropriate, we utilise our voting rights as a means of escalation following our engagements.

Climate change is one of our Group-level thematic priorities and guides stewardship activities across both our Affluent and HNW segments. Each segment maintains its own RI Policy, CAP, and stewardship approach, tailored to its investment processes and customer base.

Alongside our Affluent and HNW CAPs, please refer to the following publications on our [stewardship page](#) for further detail:

- **Stewardship Code Policy and Context Disclosure:** This outlines each segment's approach to engagement priorities, voting practices, and escalation measures.
- **Stewardship Code Activities and Outcomes Report:** This provides an annual update on engagement and voting activities undertaken during the reporting period, as well as collaborative engagements we contribute to.

Colleagues

Delivering on our strategic objectives and implementation strategy requires a collective effort that extends beyond the Corporate Sustainability team. To embed sustainability across the business, we are working collaboratively with teams throughout Quilter to set achievable goals, enhance decision making, and ensure delivery. Equipping colleagues with the knowledge and tools to understand climate and sustainability issues is essential to enabling informed and responsible choices in their day-to-day roles.

In 2025, the Corporate Sustainability function initiated our colleague engagement strategy, which will be further developed in 2026. We have identified key internal stakeholders who play a critical role in integrating sustainability into core business functions:

- **Procurement team:** is working to embed sustainability considerations into our due diligence processes and support the development of our supplier engagement strategy.
- **Property team:** a monthly working group with the Corporate Sustainability function to share information, generate sustainability initiatives, track implementation progress, and support the development of our landlord engagement strategy.
- **Finance team:** helping to integrate climate strategy into our financial planning processes.

To increase awareness and build capability across the organisation, we are also expanding our colleague engagement activities. This includes integrating climate change and corporate sustainability into our induction programme, providing e-learning modules and tailored information packs for key stakeholders, and hosting 'lunch and learn' sessions to share updates on climate developments and sustainability initiatives.

Government and regulatory bodies

Our engagement with government and regulatory bodies is primarily focused on contributing to the development of regulatory policy through formal consultation responses, either directly or via our membership of industry bodies.

We have recently responded to consultations on the UK Sustainability Disclosure Requirements ("SDR"), assurance of sustainability reporting, and transition plan requirements. We are supportive of mandatory disclosure frameworks that help UK companies calculate value chain emissions and improve visibility across supply chains. However, we have also emphasised the importance of ensuring these requirements are proportionate and practical. In particular, we have highlighted the risk that overly complex rules could turn transition planning into a compliance exercise rather than a strategic, leadership-driven process.

To support effective implementation, we have advocated for clear and simple guidance that supports and guides companies in achieving net zero. We will continue to engage constructively with policymakers and regulators to help shape a regulatory environment that supports the UK's transition to a low-carbon economy.



Metrics and targets

Metrics and targets

The UK has a legally binding commitment under the Climate Change Act 2008 to achieve net zero GHG emissions by 2050, in alignment with its obligations under the Paris Agreement. As part of this, the UK has submitted Nationally Determined Contributions (“NDCs”) to the United Nations Framework Convention on Climate Change (“UNFCCC”), including a target to reduce emissions by at least 81% by 2035 compared to 1990 levels, reflecting its role in limiting global warming to well below 2°C.

To effectively track progress and drive accountability across our climate strategy, Quilter uses a structured set of metrics and targets. At the core of our approach is our GHG emissions, which represent the most critical measure of our transition journey. These emissions, both operational and financed, are published annually in our TCFD Report and form the foundation of our net zero ambition.

To support the delivery of our strategy and identify opportunities for improvement, we also monitor a range of supplementary metrics. These include intensity-based indicators (such as emissions per employee and per square foot), criteria-based scorecards, and engagement-related KPIs. These tools help us assess performance across our office locations and guide our engagement activities.

The targets outlined in this section apply specifically to Quilter’s Group operations. Climate-related targets for responsible investment are being developed through our Affluent and HNW CAPs, which set out clear milestones for future integration.

Assurance over our metrics

Our operational emissions included in our 2025 TCFD Report were subject to public limited assurance conducted by PwC. We feel this is an important element in transparent and trustworthy climate reporting, especially when disclosing progress against our emissions targets. For the full audit opinion and scope of assurance, please see our latest TCFD Report.

Our key targets and commitments

“Where possible, procure 100% of our electricity from renewable sources by 2028”

Quilter aims to procure 100% of its electricity from renewable sources by 2028, where feasible. This is calculated as a percentage of total electricity consumption, excluding locations where renewable tariffs are not available (e.g. Jersey). We define renewable electricity as that covered by a Renewable Energy Guarantee of Origin (“REGO”) or equivalent Renewable Energy Certificate (“REC”) confirming 100% renewable generation.

This target is a key enabler of our broader operational emissions reduction goal and is considered a sub-target of our absolute Scope 1 and 2 emissions reduction targets (80% reduction by 2030 from a 2020 baseline).

Recognising that not all energy contracts are under our direct control, we have structured delivery into two key milestones:

- **Phase One:** Transition all Quilter-controlled energy contracts to renewable tariffs by 2027
- **Phase Two:** Engage with landlords and property managers to transition their controlled contracts to renewable tariffs by 2028

As of December 2025, 85% of our electricity consumed across our offices was procured from renewable sources. Progress will be monitored annually and disclosed in our TCFD Report.

“Reduce our operational Scope 1 and 2 emissions by 80% by 2030, from a 2020 baseline”

The target is reviewed annually by the Remuneration Committee with input from the Corporate Sustainability team. In 2025, we updated our Scope 2 emissions methodology from a location-based to a market-based approach. The location-based method relied heavily on the UK Government’s 2030 target to decarbonise the electricity grid by 95% and limited our ability to influence outcomes through electricity procurement decisions. In contrast, the market-based approach enables us to take more direct action and provides greater scope for emissions reduction by incorporating impacts from renewable energy procurement. Given that this target is embedded in our senior leaders’ Long-Term Incentive Plan (“LTIP”), we believe the market-based method offers a more appropriate and actionable framework for our emissions target.

This target reflects our strategic ambition to reduce operational emissions as a foundational step towards achieving net zero by 2050. In line with UK Government guidance, we prioritise direct decarbonisation and will only use carbon offsets to address residual, hard-to-abate emissions once our target has been achieved. As such, offsetting is not included as a means of achieving this target.

Details of our market-based emissions calculation methodology are provided in Appendix 2 of the Quilter plc TCFD Report, and progress against this target is disclosed annually in the metrics and targets section of the report. Our implementation and engagement strategies outline the actions we are taking to improve energy efficiency and increase renewable energy procurement across our offices.

Quilter’s market-based Scope 1 and 2 emissions were 3,245 tCO₂e in our 2020 baseline year, and 681 tCO₂e in 2025, representing a 79% reduction over five years. This progress reflects the impact of strategic actions, including the sale of our international business, rightsizing our office footprint, and reducing energy consumption.

Looking ahead, based on current projections and assuming we meet our 80% reduction target and renewable energy procurement goals (excluding Jersey), our total Scope 1 and 2 market-based emissions are expected to be approximately 437 tCO₂e by 2030 which is below our target of 515 tCO₂e. These projections account for committed energy efficiency measures and planned removal of fossil fuel sources across our buildings, procuring renewable energy contracts for our all buildings, and the increased renewable energy percentage of the EU Residual Mix.

Residual emissions will primarily stem from sites where landlords have not yet committed to removing gas supplies (an area we aim to influence through our engagement strategy) and from the geothermal heat source in Southampton, which remains under contract until the end of 2030. We will continue to pursue opportunities post 2030 to reduce emissions from these sources.

To support our growth and ensure that our emissions reduction targets remain meaningful and achievable, we adjust our baseline year and associated targets to account for any mergers or acquisitions. This prevents acquisitions from artificially inflating our emissions profile and negatively impacting progress against our targets. Our approach is consistent with the GHG Protocol Corporate Standard, which recommends recalculating the base year to reflect structural changes, thereby maintaining the integrity and comparability of emissions performance over time.

Scope 3 targets

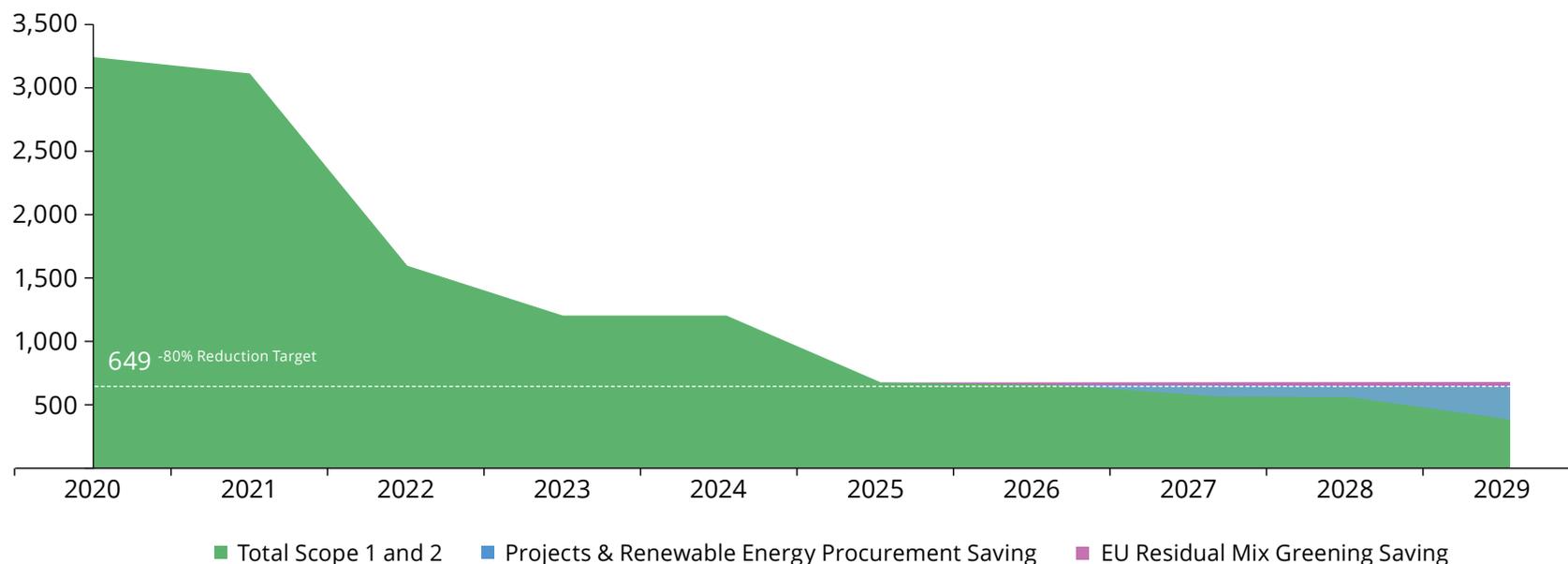
As outlined in the foundations section of this plan, our focus and priority are on reducing our Scope 1 and 2 operational emissions. We have not set emissions reduction targets for our Scope 3 emissions. We will be exploring the feasibility of Scope 3 reduction targets following phase two of our engagement strategy and will consider including Scope 3 targets in the next iteration of our plan. Some of the targets we are currently exploring are:

- absolute supply chain emissions reduction targets;
- percentage of Quilter expenditure with suppliers that have a science-based target or climate transition plan. This ensures long-term emissions reductions in our supply chain and ensures suppliers are aligned to net zero 2050 (or earlier);
- zero waste to landfill target. While Quilter does not produce excessive amounts of waste and related emissions, commercial waste taken to landfill creates over 100 times the emissions of incinerated waste⁶; and
- absolute emissions reductions targets for business-travel-related emissions or percentage of flights purchased using sustainable aviation fuel.

⁶ UK Government GHG Conversion Factors for Company Reporting

Our 2030 Scope 1 and 2 projections

Quilter projected market-based emissions (Scope 1 and 2)



The following assumptions have been applied in our emissions projections:

- **Light Emitting Diode (“LED”) installation:** Our model assumes that LED lighting reduces light-related electricity consumption by 75%^{7,8,9}.
- **BMS installation:** BMS upgrades and installations are expected to reduce energy consumption by 30%^{10,11,12} due to efficiency savings.
- **Gas boiler removal:** Where offices have plans to replace gas boilers with energy efficient HVAC systems, no stationary combustion emissions will be produced from that office and any resulting increases in electricity consumption will be sourced under renewable energy contracts and will therefore not impact Scope 2 emissions.
- **Renewable energy procurement:** This model assumes that all Quilter office locations are able to switch to 100% renewable energy contracts or purchase EACs to remove market-based electricity consumption emissions.
- **EU Residual Mix:** During the transitional years to procuring 100% renewable energy, the model assumes a 39% reduction in the EU Residual Mix GHG intensity from 2024 to 2030 in line with the projections from the European Environment Agency (“EEA”).

⁷ How LED Lights Save Energy and Money – SimplyLED

⁸ How Much Do LED Lights Save Per Month? (2025)

⁹ Energy saving light bulbs and lighting – Energy Saving Trust

¹⁰ Building Management System – Design & Optimisation | E.ON

¹¹ Why a BMS should be part of your energy saving journey – Cube Controls

¹² Using your BMS to create Wellbeing – going beyond energy efficiency | EM Magazine

Performance monitoring metrics

Intensity metrics

To support our net zero ambition, our targets focus on reducing absolute operational emissions. However, as a growing business, we also track intensity metrics to assess performance in a way that reflects both growth and operational efficiency:

- ▶ Total operational emissions per £1million in revenue
- ▶ Total operational emissions per full time equivalent (“FTE”)

Operational metrics

The below table sets out some of the internal KPIs we will use to monitor the sustainability performance of our offices in relation to operational emissions and renewable energy targets and inform our engagement strategies.

Metric	KPIs	Purpose
Office carbon intensities	<ul style="list-style-type: none"> – Carbon intensities per square foot and per employee at each office. 	We assess carbon intensity per square foot and per employee at each office annually, focusing on Scope 1 and 2 emissions. These metrics support office-level performance reviews and help identify high-impact locations. They inform our engagement strategy and track progress at each of our offices.
Renewable energy procurement	<ul style="list-style-type: none"> – Number of offices procuring renewable energy as a percentage of offices with Quilter controlled energy contracts. 	This is monitored throughout the reporting year and is in place to monitor progress against our renewable energy target. This will also be key in ensuring compliance with any future internal policy commitments with regards to energy procurement.
	<ul style="list-style-type: none"> – Number of offices procuring renewable energy as a percentage of offices with landlord-controlled energy contracts. 	This is monitored throughout the reporting year and measures the effectiveness of our property engagement strategy while also identifying target offices for engagement or escalation.
	<ul style="list-style-type: none"> – Percentage of total electricity consumption generated from renewable sources. 	This is calculated at the end of the reporting period once all of the energy consumption data is available for our offices. It measures the overall progress against our target and ensures we target the most impactful offices in terms of energy consumption.
Office sustainability standards	<ul style="list-style-type: none"> – Percentage of offices with an EPC rating of C or above. – Percentage of offices with HVAC, BMS, smart metering, and/or LED lighting. – Percentage of offices meeting BREEAM or other sustainability building standards. 	These metrics are monitored throughout the year and are updated on an ad hoc basis when we receive updated information from our property managers. They all form part of our office scorecard and monitor compliance with our minimum standards. Improvements in these metrics are a performance indicator for our engagement strategy and will ultimately lead to long-term energy efficiencies and emissions reductions, thereby contributing to meeting our target. We consider these in terms of percentage of our offices but also in terms of square footage to ensure we adequately account for the most impactful offices, and the figures are not skewed by smaller offices.

Metric	KPIs	Purpose
Engagement targets	<ul style="list-style-type: none"> Percentage of landlord managed offices with renewable electricity procurement – targeting 100% by 2028. Percentage of landlords engaged on sustainability topics during the reporting period – targeting 100%. Percentage of landlords providing utilities and waste data for the reporting year – targeting 100%. Frequency of landlord sustainability reporting or data sharing – targeting quarterly. 	These KPIs are in place to monitor the performance of our engagement strategy, and we have set annual targets for these to ensure our delivery remains on track. These monitor both the delivery of the engagement strategy, in terms of the number of landlords or property managers that we have successfully engaged with, and successful targeted outcomes in terms of renewable electricity procurement.
Waste management	<ul style="list-style-type: none"> Percentage of waste to landfill. Percentage of waste recycled. 	These are reviewed and calculated at the end of the reporting period when full year data is available. They act as positive and negative indicators of how we dispose of waste. We will consider setting waste disposal objectives in our future strategies.
	<ul style="list-style-type: none"> Percentage of offices with food waste and recycling bins. Percentage of offices that track waste volumes and disposal methods (and provide data). 	These are monitored throughout the reporting period and updated on an ad hoc basis. They are calculated in terms of absolute office numbers and using square foot to provide a more holistic view that accounts for office size. These will initially be used to inform our wider engagement work, but we will explore whether targets should be set for these metrics.
	<ul style="list-style-type: none"> Total waste produced per FTE by office (measured as kg/FTE). 	This will be used to inform our engagement activities and highlight offices producing more waste per person and should be targeted in our engagement efforts.

Supply chain metrics

To monitor the performance and delivery of our supply chain strategy, we plan to utilise two sets of KPIs:

Metric	KPIs	Purpose
Engagement KPIs	<ul style="list-style-type: none"> Percentage of material suppliers engaged by spend. 	Our objective for our supplier engagement strategy is to engage with the majority of our material suppliers. This KPI supports accountability in delivering our objective and ensuring we remain on track. We do not monitor this in terms of our total spend as we only plan to engage with our most material suppliers.
Supply chain decarbonisation	<ul style="list-style-type: none"> Absolute Scope 3, Category 1 emissions (purchased goods and services). Carbon intensity of supply chain relative to our total spend – tCO₂e per £1 million spend. 	We monitor year on year changes in both absolute emissions and the carbon intensity of our supply chain as a success measure of our engagement and policy efforts to decarbonise our supply chain. To reach net zero, we must reduce our absolute supply chain emissions, however, the intensity metric is a clearer measure of performance that accounts for an increased spending as a result of business growth or inflation.
	<ul style="list-style-type: none"> Percentage of suppliers with a sustainability certification. Percentage of suppliers with an SBTi validated or aligned target or a published climate transition plan. 	We consider these KPIs to be long-term success measures of our supplier strategy, acknowledging that improvements will take time to implement. We have not set specific targets for these yet, but we aim to see gradual, year on year improvements. These are considered in both absolute terms (number of suppliers) and in terms of percentage of our spend. They both contribute to the long-term decarbonisation of our supply chain.
	<ul style="list-style-type: none"> Improvements in supplier scorecards. 	We will use a proprietary supplier scorecard to assess and determine targets for our engagement activities and identify suppliers that need to be escalated internally. Year on year improvements act as a success measure for our supplier strategy.

Carbon credits

We believe that high-integrity voluntary carbon offsets can play a meaningful role in achieving carbon neutrality, but only when used responsibly to offset residual emissions after all reasonable abatement efforts have been made. To date, we have not used carbon credits as part of our corporate sustainability or responsible investment strategies. Our current focus remains on reducing emissions at source, and we view abatement as the priority in our decarbonisation efforts. This approach is consistent with guidance from the UK Government¹³, SBTi, and the Oxford Offsetting Principles¹⁴.

Looking ahead

We have outlined the specific emissions sources where carbon credits may be utilised to offset residual emissions in our implementation strategy. We are exploring the possibility of setting a short-term carbon neutrality target for our Scope 1 and 2 operational emissions, which will be disclosed in the next iteration of our Climate Transition Plan before 2030. If we achieve our 80% Scope 1 and 2 emissions reduction target by 2030, we anticipate purchasing offsets for approximately 450 tonnes of CO₂e. However, even where offsetting is used, we remain committed to continuing our longer-term abatement efforts in parallel.

In developing our carbon offsetting strategy, we recognise the importance of the following principles:

- ▶ **Quality and integrity of offsetting projects:** we will use the Integrity Council for the Voluntary Carbon Market's ("ICVCM's") Core Carbon Principles¹⁵ to identify high-quality credits that deliver real, measurable climate impact.
- ▶ **Certification and verification:** we will only purchase offsets from reputable sources or intermediaries, verified under recognised standards such as the Verified Carbon Standard, the Gold Standard, or the Clean Development Mechanism ("CDM").
- ▶ **Transparency:** we will disclose how offsets have been used, the volume of residual emissions offset, and, where possible, details of the projects funded. This will be included in our annual TCFD reporting.
- ▶ **Additionality:** we will consider the principle of additionality when assessing offsetting projects and aim to only support initiatives where emissions reductions or removals would not have taken place without the financial incentive provided by the carbon credits.
- ▶ **Permanence:** in line with the Oxford Offsetting Principles, we will aim to shift our offset portfolio over time toward removals and long-lived storage solutions, while maintaining a diversified mix that may include avoidance and nature- or technology-based removals, subject to availability and pricing.
- ▶ **Co-benefits:** we will also consider the broader sustainability benefits of offsetting projects, such as biodiversity, community development, or water conservation, when making purchasing decisions.

¹³ *Principles for voluntary carbon and nature market integrity – GOV.UK*

¹⁴ *The Oxford Offsetting Principles | Smith School of Enterprise and the Environment*

¹⁵ *CCP-Section-2-V2-FINAL-6Feb24.pdf*

Governance

The governance arrangements in place to oversee our climate transition plan.



Governance

The Quilter plc TCFD Report outlines our governance structures at both Group and Entity (segment) level, explaining the climate-related responsibilities of each Board and Management Committee and responsible individuals. This section outlines the governance and oversight of the Quilter plc Transition Plan.

Transition plan governance

The Quilter plc Climate Transition Plan is led by the Corporate Sustainability (“CS”) function, with input from relevant business areas. Our operational targets are developed and overseen by the CS team with support from our Central Operations function. The Affluent and HNW CAPs are developed and owned by the respective Responsible Investment teams, in collaboration with their investment functions. Governance of the Climate Transition Plan aligns closely with that of the TCFD Report, which serves as our annual progress update. This ensures consistent oversight of both the transition plan and the CAPs by the relevant committees.

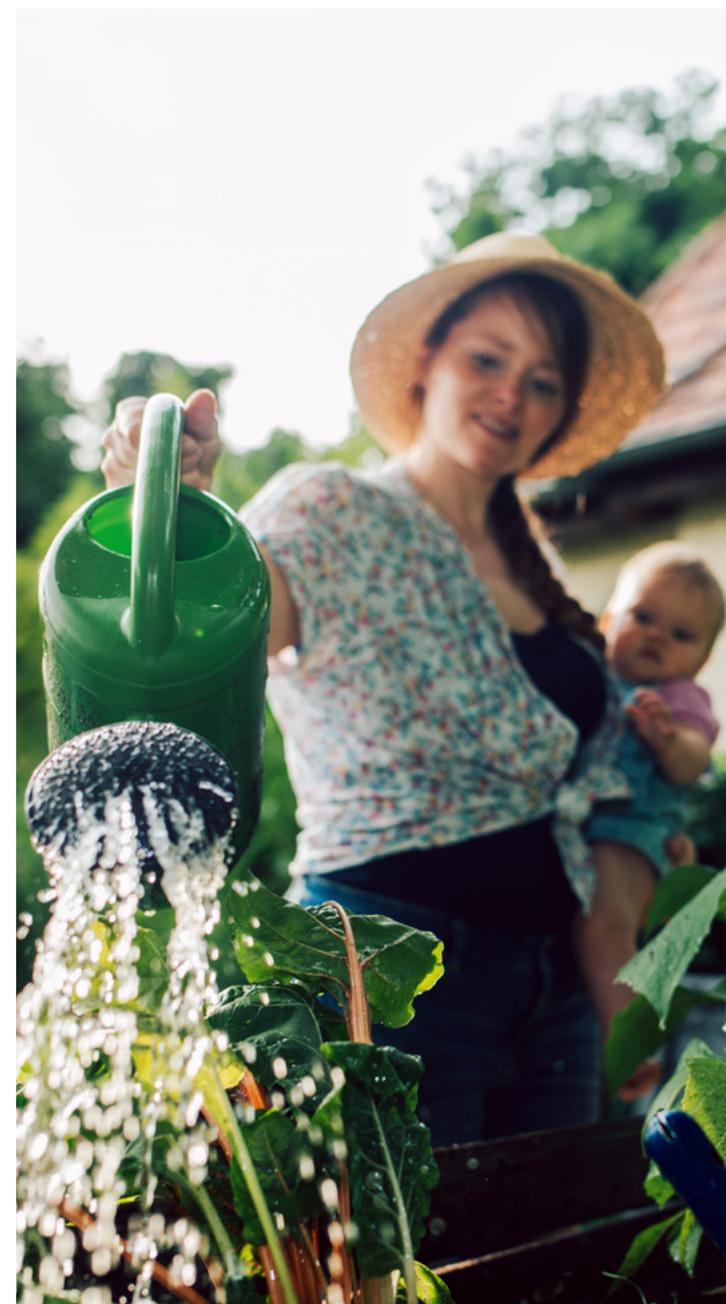
The Quilter plc Board is responsible for setting and overseeing the delivery of the Group’s strategic priorities, including those in relation to responsible investment and corporate sustainability. The Board is briefed regularly on responsible investment performance and annually on the progress made on the implementation of Quilter’s corporate sustainability initiatives, including our targets, goals and ambitions, and any key issues impacting their delivery. These updates include the strategic approach to responsible investment and climate issues, and related commitments. The Board Corporate Governance and Nominations Committee regularly reviews the industry knowledge and experience of our Directors to ensure that the composition of the Board supports the delivery of the Group’s strategy. The Board also engages specialist internal and external speakers, as appropriate, to brief the Board on relevant topics.

In February 2026, the Board reviewed and approved the Climate Transition Plan, including its strategic ambitions, following approval by the Quilter plc Executive Committee. The Board and the Executive Committee will monitor its delivery through annual progress updates. The Climate Transition Plan is not subject to shareholder approval.

The Quilter plc Executive Committee has direct oversight of the Climate Transition Plan and Quilter’s corporate sustainability strategy. It receives quarterly updates from the Responsible Investment and Corporate Sustainability teams. To support its oversight, the Executive Committee has appointed executive sponsors for the Responsible Investment and Corporate Sustainability functions.

The Climate Transition Plan is led by the Corporate Sustainability (“CS”) function, with input from relevant business areas. Our operational targets are developed and overseen by the CS team with support from our Central Operations function. The Affluent and High Net Worth Climate Action Plans are developed and owned by the respective Responsible Investment teams, in collaboration with their investment functions.

Further information on the climate-related duties assigned to the relevant Boards, Board Committees, management committees, and key responsible persons at both the Group and individual entity levels is set out in the Quilter plc TCFD Report on our website at plc.quilter.com/tcfid.



Executive Remuneration

The Board Remuneration Committee oversees and approves the remuneration arrangements for the Group, including consideration of ESG-related metrics and targets, which form part of the executive scorecard for reward purposes. Climate-related metrics, specifically the reduction in Scope 1 and 2 emissions and the Principle for Responsible Investment (“PRI”) Framework which both form part of the Company’s long-term incentive plan (“LTIP”), are routinely reviewed by the Board Remuneration Committee. These updates provide an indicative view of forecast outcomes for LTIP awards and inform target setting and any changes to performance measures for future awards.

